

NORTHERN DISTRICT OF CALIFORNIA

Defendants.

**[PROPOSED] ORDER APPROVING
AMENDED PROPOSAL FOR
DISSEMINATION OF NOTICE TO THE
CLASS**

3. Within 21 calendar days of the entry of this order, the Administrator will email the notice, Dkt. No. 213-2, to potential class members. In those instances in which the Administrator does not have potential class members' email addresses, it will mail the notice via USPS first-class mail.

1 4. The Administrator will use reasonable efforts to give notice to brokerage firms,
2 banks, institutions, investment funds, investment companies, investment advisors, investment
3 portfolios, mutual fund trusts, mutual investment funds, investment managers, and any other
4 persons or entities who are or who claim to be nominees that purchased or otherwise acquired
5 Wells Fargo common stock during the Class Period for the benefit of another person. Such
6 nominees will be given two options: (i) they can, within 7 calendar days of receipt of the notice,
7 forward the notice to all such beneficial owners by email, or by mail where no email address is
8 available; or (ii) they can, within 7 calendar days of receipt of the notice, provide a list of the names
9 and email addresses of all such beneficial owners to the Administrator, in which case the
10 Administrator will promptly email the notice to such beneficial owners.

11 5. Contemporaneously with the emailing of the notice, the Administrator will
12 establish the dedicated website to make available to class members the long-form notice, Dkt. No.
13 213-4, and other case information and filings, including: (1) the Court's order re class certification
14 (Dkt. No. 211); (2) the consolidated complaint (Dkt. No. 46); (3) the Court's order re the motion
15 to dismiss (Dkt. No. 74); (4) defendants' answers to the consolidated complaint (Dkt. Nos. 79, 80),
16 as well as other such documents as the parties may agree or the Court may require. The website
17 will be available until at least one year after any settlement, other resolution, or the conclusion of
18 trial and exhaustion of all possible appeals in this action. The Administrator also will establish a
19 toll-free telephone number for class members to call if they have questions or to request copies of
20 the class notices or other documents. The Administrator will provide live operators during
21 business hours to answer the telephone, respond to ministerial matters such as requests for copies
22 of the notices, and direct any substantive questions to class counsel, Robbins Geller Rudman &
23 Dowd LLP.

24 6. Within 14 calendar days of emailing and mailing the notice, as described in
25 paragraph 3 of this order, the Administrator will cause the publication notice, Dkt. No. 213-3, to
26 be published in *The Wall Street Journal* and posted on *PR Newswire* as a means of reaching
27 prospective class members not receiving the notice.
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7. The Administrator will also cause the notice and long-form notice to be published by the Depository Trust Corporation (DTC) on the DTC Legal Notice System.

8. The case website and long-form notice will provide an address for the purpose of receiving requests for exclusion from the class and requests for copies of the notice from, *inter alia*, nominee purchasers of Wells Fargo common stock.

9. Class members seeking to request exclusion from the class will submit a written request for exclusion as set forth in the long-form notice and postmarked no later than 90 days after the Court's entry of this order, which date will be included in the notice and long-form notice.

10. The Administrator will identify and number all exclusion requests received and create images of those requests for class counsel and counsel for defendants. The Administrator will maintain original requests in its files. The Administrator will promptly provide via email copies of any exclusion requests received to class counsel and counsel for defendants, as set forth below:

Counsel for Plaintiff and Class Representative Construction Laborers Pension Trust for Southern California	Counsel For Defendant Wells Fargo	Counsel for Defendant Timothy Sloan
Spencer A Burkholz Scott H. Saham ROBBINS GELLER RUDMAN & DOWD LLP SpenceB@rgrdlaw.com ScottS@rgrdlaw.com	Brendan P. Cullen Christopher M. Viapiano SULLIVAN & CROMWELL LLP CullenB@sullcrom.com viapianoc@sullcrom.com	Josh A. Cohen Adam F. Shearer CLARENCE DYER & COHEN LLP jcohen@clarencedyer.com ashearer@clarencedyer.com

11. Within 7 calendar days following the exclusion deadline, class counsel will file with the Court proof of emailing and mailing of the notice, proof of publication of the publication notice, and an affidavit setting forth a list of all persons and entities who have validly and timely requested exclusion from the class no later than 90 days after the Court's entry of this order, which date will be included in the notice and long-form notice, as well as a list of persons who requested exclusion from the class that were not deemed to be valid or timely.

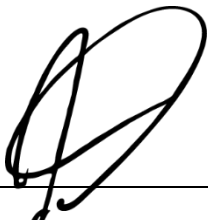
1 12. Subject to potential reimbursement, the costs of notice will be borne by class
2 counsel.

3 13. Nothing in this order will restrict defendants' rights to move to de-certify the class,
4 in whole or in part, or to seek the exclusion from the class of certain entities or individuals at a
5 later date.

6 **IT IS SO ORDERED.**

7 Dated: October 28, 2022

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JAMES DONATO
United States District Judge